

MO
ECON. Job
9:990-91

MISSOURI STATE LIBRARY

OCT 23 1990 399

DEPOSITORY DOCUMENT



Governor's Coordination and Special Services Plan

for Program Years 1990 and 1991



MISSOURI
A T W O R K

TABLE OF CONTENTS

Introduction	1
Governor's Goals and Objectives	3
Coordination Criteria	6
Evaluation of Past Experience	8
Resource Use	11
<i>Title II SDA Level Resource Use</i>	<i>11</i>
<i>Title II-A 5% Administrative Activities</i>	<i>11</i>
<i>Title II-A 3% Experienced Worker Program</i>	<i>12</i>
<i>Title II-A 8%</i>	<i>13</i>
<i>Title II-A 8% State Education Funds</i>	<i>13</i>
Oversight and Support Activities	16
Performance Standards	17
State Incentive Grants	19
Governor's Coordination & Special Services Activities	21
Assurances	24
Appendices	25

INTRODUCTION

The Governor's Goals and Objectives for job training in Missouri have guided the Coordination and Special Services Plan development. The Goals and Objectives establish direction for the use of job training resources which resulted in the activities described in the Coordination and Special Services Plan. These goals and objectives were in turn fashioned by a number of state and local actions reflective of federal initiatives.

Program Year 1989 saw the publication of "Working Capital: JTPA Investments for the 90's." It was the culmination of an Employment and Training Administration's project to refine its job training policy for the 1990's. An Advisory Committee, convened to review five (5) years of program experience under the Job Training Partnership Act (JTPA), reaffirmed the program's basic mission to train economically disadvantaged individuals for gainful employment, in order to increase their earnings and reduce their dependence on welfare.

How this is to be accomplished produced much debate about a series of interlocking social and economic problems. No consensus was reached on all points and recommendations, but the Committee did reach consensus on major principles. This led them to recommend steering the JTPA system to be more prescriptive as to clients and outcomes, while at the same time providing localities with a wider range of tools for defining and delivering services.

The report repeatedly stressed the belief that employers will support a training system which recognizes the need for a work force that has received the added value of quality education and training, which will enhance their probability of long-term employability and economic self-sufficiency.

The recommendations of this study further validated the direction the Governor has emphasized for Missouri's employment and training system over the past few years. Missouri has continued to move forward in refining its approach to economic need and taking steps to prepare Missouri's work force to meet changing workplace requirements in the year 2000 and beyond.

All projections concerning Missouri's future indicate the state's economy will be more dependent on knowledge than it is today. Future gains in productivity will depend on the knowledge and skill that workers bring to their tasks.

The Jobs for Missouri's Future (JMF) program is a multi-sector program to develop a long range human resource strategy for the State of Missouri --a strategic plan that will help integrate the State's work force and economic development efforts to assure a strong and competitive economy into the next century.

Specific outcomes of the program will include:

1. Detailed skills inventory of occupations that are key to Missouri's future economy;

2. Data base and assessment instruments to permit continuing analysis and assessment of changing work force needs;

3. Increased public awareness of and support for work force preparation programs;

4. Public Education materials, including documentaries, public service announcements, print materials, and regional or community meeting guides for use in generating public awareness of the need for continuing education and training; and

5. Action programs to create institutional structures to increase the supply of workers with critical skills. The Governor has long recognized that an effectively coordinated job training and placement system is essential to assure Missouri's economic growth and quality of life.

Missouri has taken increasingly significant steps to bring together the various job training agencies and programs to form a more closely coordinated system of services.

In PY'88 and PY'89, the local JTPA Service Delivery Areas (SDAs), in conjunction with their Private Industry Councils (PICs), prepared and implemented coordination plans to address three (3) coordination criteria:

- Improve a Missouri resident's ability to identify available training and employment opportunities and to enroll in appropriate program activities;
- Develop a plan to reduce duplicate, costly, and often confusing employer contacts by various job training agencies and programs; and

- Improve information sharing and policy development between local job training and education programs.

The job development and training system must now move ahead to meet future challenges. Continued economic progress will require an efficient use of resources while providing for quality services. Increasing opportunities for participation in the labor market and in training programs by all of Missouri's citizens will require innovative approaches to program design and funding. A continually changing economy necessitates programs which provide a flexible and adaptable work force so that the job obtained will be retained.

GOVERNOR'S GOALS AND OBJECTIVES

The following goals and objectives highlight the Governor's priorities for the job training and placement system. They are a description of the direction in which the system should move as it strives to meet the needs of Missouri, its employers, and its citizens in a rapidly changing economy.

Provide Opportunity and Ensure Economic Growth

Increasing Missouri's economic potential requires a strong coordinated approach to economic development. In turn, effective economic development necessitates diverse yet interrelated efforts to assist employers. Such efforts may include assisting new companies locating in Missouri, supporting existing businesses with expansion efforts, and assisting distressed industries facing layoffs or plant closures. The job training system can play an important role in meeting this goal by achieving the following objectives.

- Expand a marketing program which clearly communicates to employers and the public the availability and capability of job training and economic development resources in Missouri.

- Increase the efficiency of delivering training for potential employees of new or expanding businesses, and when necessary, provide retraining and upgrading to support new capital investments of existing businesses through both state and federal resources.
- Provide programs which train workers in the skills required by employers and meet employer's hiring and production needs.
- Provide continued support to ensure a comprehensive, effective public labor exchange.
- Promote and support continuing improvements in Missouri's labor market information system.
- Promote and support an inter-agency rapid response capability to assist Missouri employers, employees, and communities faced with mass layoffs or plant closures to lessen the economic impact.
- Promote and encourage further opportunities for "open entry, open exit" programs for occupationally specific training.

Increase Missourians' Skills to Improve Individual Economic Potential

An educated citizenry is Missouri's greatest asset as we move toward the 21st century. Missourians must be proficient in the basic skills necessary for self-sufficiency and for the more advanced and flexible employment opportunities of the future. Job specific vocational skills will continue to be necessary to acquire and retain productive employment. This supports the Governor's Advisory Council on Literacy's basic philosophy that education should enable individuals to maximize their potential for an enriched life. Meeting the objectives below will help Missourians achieve their maximum individual economic potential.

- Provide access to and acquisition of basic literacy skills particularly when such programs enhance job training tailored for the workplace.
- Provide the means for welfare families, particularly mandatory JOBS participants, to gain knowledge and job skills necessary to become financially independent.
- Ensure training opportunities are developed which enable women and other targeted populations including the homeless and veterans to effectively participate in Missouri's work force.
- Continue to implement public/private initiatives to address the remedial and basic education needs of, as well as opportunities to gain work experience for, at-risk youth.
- Encourage the use of employer knowledge to complement available labor market information to plan training programs.

Increase the Efficiency and Effectiveness of Missouri's Job Training Program Delivery System

Missouri's job training and development system is composed of economic development, training, and placement agencies in four departments of state government which administer a wide variety of federal, state, and local job development programs. In addition, a number of agencies provide supportive services to training program participants or use the training system to provide services to their clients. Clearly, these agencies as well as other statewide organizations such as the Missouri Organization of Private Industry Council Chairpersons, Training and Employment Administrators of Missouri, and various councils and associations involved with vocational education, community action, and women's economic development must work together with private business and industry to ensure effective program implementation. By meeting the objectives outlined below, Missouri can ensure improved operation of job training programs.

- Encourage increased involvement of Private Industry Councils in the design and development of local job training programs.
- Ensure professional staff maintains a high quality of service.
- Continue to develop and refine communication channels for job training issues among respective state agencies.
- Support joint job training projects among related state agencies and initiate additional projects which meet the Governor's goals.
- Support the partnerships between state and local governments, service agencies, and business and civic leaders to develop and implement a coordinated strategy to identify and meet the requirements of the work force of the future.

- **Encourage cooperative uses of training and employment funding, facilities and staff resources for a more comprehensive and coordinated statewide system.**

COORDINATION CRITERIA

The Council and Governor recognize the diverse agencies and programs which constitute Missouri's job development and training system. Changing demographics and economic conditions, however, require that Missouri blend these diverse but related service delivery systems into the most effective and efficient training and employment system possible.

Current projections indicate that Missouri's future labor force needs will require the productive contributions of people who currently have limited education and work skills. It is anticipated that many will be minorities, women and those who have been on welfare. Both the welfare and job training systems are being mobilized to address these issues. Neither of these systems alone has the expertise or resources to serve all of the potential participants or to provide the intensive educational and training services needed to reach the more disadvantaged participants. In this environment, effective collaboration between the two systems offers the potential to overcome agency limitations and to provide more cost-effective, more varied, and better quality training to all participants and employers.

The educational system and employment security system are also indispensable partners to the training and employment system. Characteristics of the future work force projections indicate many future workers will lack basic education skills or will need specialized occupational training. This is especially evident in youth who are at

risk or have dropped out of school and lack necessary skills to obtain employment. Once training is complete, the successful placement of a potential employee with a prospective employer is required to complete the sequence of training and employment services. Working together can be the route for each system to increase its ability to meet its own organizational goals and legislative requirements.

Ultimately, coordination criteria improve the diversity, quality and efficiency of training offered to participants. The coordination plans developed and implemented by each SDA under the previous year's coordination criteria are a solid first step toward the goal of joint planning for the training and employment system. The three common information collection and dissemination efforts identified in the previous years' criteria; i.e., participant intake, job development and employer contact, are still of prime importance to coordination during PY'90-91.

The previous year's criteria specified particular agencies or groups who were to participate in the planning and then the implementation of the plans. Each plan had specific required outcomes. In addition, the criteria called for an educational linkage policy to be developed and implemented to help target federal and state resources to maximize educational services.

Through the development and implementation of these plans and policies, the agencies involved learned to help potential partners realize the con-

straints faced by various agencies and the benefits that can accrue from effective collaboration. It also become apparent that while coordination has its greatest potential payoff at the local level, there are policy and regulatory areas which are more properly addressed at the State level.

In order to promote and facilitate the continued collaboration among agencies within the employment and training system and the implementation and refinement of the local SDA coordination Outreach, Intake, Assessment and Referral and Employer Marketing plans and the Education Linkage Policy, the Coordination Criteria for PY'90-91 will primarily focus on state-level actions.

The state agencies which will be included in the task groups to carry out the Coordination Criteria will include representatives from vocational and post-secondary education, employment and economic development, and public assistance, which includes services to the homeless and rehabilitation agencies.

The coordination criteria for PY'90-91 are:

1. State agencies will identify candidates for common definitions within training-related programs. Once identified, state agencies will attempt to develop common definitions to be used across programs at the state and local SDA level.

2. State agencies will investigate the potential for sharing pertinent training related information with each other. The initial emphasis for sharing should be to track participants across programs, to evaluate programs, to develop participant profiles and to prepare reports. If necessary, state agencies will actively pursue clarification and interpretation at the federal level.

3. State agencies will promote the identification and use of common assessment factors, ap-

proaches or screening methods within the training and employment system of Missouri.

4. Continued collaboration at the local level among the various agencies identified in the Coordination Plans will continue and local agencies will provide input to the state agencies on the tasks identified in PY'90-'91 Coordination Criteria.

5. Local training and employment agencies will use definitions, information systems and assessment approaches agreed upon by the state agencies. The state agencies shall provide for appropriate review and comment by local agencies prior to implementation of this criterion.

EVALUATION OF PAST EXPERIENCE

Missouri's Job Training Partnership Act (JTPA) Experience - Program Year 1988 and Program Year 1989

During PY'88 of JTPA, 17,603 Missourians entered training programs throughout the State. Of the 10,739 participants who completed the program during the year, 9,487 were placed in jobs. This represents an 88% entered employment rate.

There was little change in the training activities offered from PY'87 to PY'88. Once again, a high percentage of program participants (27%) were placed in service occupations, followed by clerical and sales (25%). Structural work, machine trades and benchwork occupations shared an approximately 8% placement rate.

Missouri's SDAs performed well on the Title II-A performance measures during PY'88. Of particular note during the program year were two performance standards - Cost Per Entered Employment, which was 42% lower for adults than the standard. Also, the placement rate for youth exceeded the standard by approximately 10%. This was the first year the Follow-Up

Entered Employment Rate standard was used. It was exceeded by 8%.

Each SDA was assessed against performance standards for both adult and youth programs under Title II-A as required by the law. Statewide, the SDAs' adult entered employment rate was 72%; the welfare entered employment rate was 58%; the average wage at placement was \$5.02 per hour; the average cost for an entered employment was \$2,554; and the follow-up entered employment rate was 61%. The SDAs' youth entered employment rate was 52%; the overall positive termination rate was 83%; and the cost per positive termination equalled \$2,778.

Six SDAs exceeded all eight adult and youth performance standards. Five SDAs exceeded seven, two SDAs exceeded six, and two SDAs exceeded five or less. All fifteen SDAs were eligible for incentive grants for exceeding a weighted average of their performance standards.

During PY'88, the state's customized training program, a program designed to meet the training needs of new and expanding businesses by tailoring training programs to employer needs and to retrain employed workers when made necessary by new capital investments, utilized several funding sources. These sources included JTPA Title II-A (8%), JTPA Title II-A funds available to each of the State's 15 PICs, the Missouri Job Development Fund, and General Revenue funds available through the Department of Elementary and Secondary Education (DESE). These com-

bined resources provided approximately \$10,270,000 during PY'88 for Customized Training activities.

The state trained 814 eligible participants using JTPA Title II-A (8%) funds. Those who entered employment received an average hourly wage of \$4.95 at an average training cost of \$951. In addition, the 15 PICs' local Customized Training activities trained 1,459 JTPA eligible participants, with 84% of them entering employment at an average hourly wage of \$5.77.

Through the Missouri Job Development Fund, the state funded 64 projects which helped train 3,721 state residents for newly created jobs, and retrained 8,463 so they could retain their current employment.

Joint efforts between the Division of Job Development and Training (JDT) and DESE resulted in an additional 32 projects to train 13,506 participants. Also, DESE provided classroom skill training programs for 119 employers which served over 19,834 participants.

During PY'88, the Experienced Worker Program served 943 age 55 and over workers; 744 were placed into unsubsidized jobs at an average hourly wage of \$4.59, with an average cost per entered employment of \$1,331.

In the first half of PY'89 (through December 31, 1989), 11,506 participants were served in Title II-A training programs statewide. Seventy-four percent (74%) entered employment.

SDA performance for the first half of PY'89 was evaluated using the Secretary of Labor's performance standards model. Statewide, the SDAs' adult entered employment rate was 79%; and the average wage at placement was \$5.22 per hour. Four Adult Follow-Up measures were included: the follow-up employment rate was 70%; follow-up weekly earnings was \$215; follow-up weeks worked for adults was 9; and follow-up welfare entered employment rate equalled 54%. Statewide, the SDAs' youth entered employment rate was 68%; and the youth employability enhancement rate was 8%.

During the first half of PY'89, customized training projects trained 188 individuals. Eighty-two percent (82%) of these individuals entered

employment. During this same period, the Division provided funding through the Missouri Job Development Fund to retrain 4,262 individuals, enabling them to continue their current employment, and trained 1,314 for newly created jobs.

The Experienced Worker Program provided job training to 511 economically disadvantaged individuals aged 55 and over during the first half of PY'89. Seventy-nine percent (79%) of the participants who completed the program entered employment.

With approximately 598,000 economically disadvantaged persons eligible for JTPA programs, Missouri's potential demand for job training far exceeds the supply of job training services. These limited job training resources must be used in the most efficient and cost-effective manner to increase employment opportunities for Missourians. By coordinating the planning, design, and delivery of job training with other related public and private activities, the programs and services benefited more Missourians than would have otherwise been possible.

Coordination activities during PY'88 and PY'89 were targeted at three levels: coordination among agencies at the state level; coordination between the State and local agencies; and coordination at the local level. At the state level, coordination efforts centered on data sharing of information among the major state agencies particularly regarding services to welfare recipients.

In cooperation with the SDAs and local basic education programs, JDT and DESE continued to expand the program design which integrated basic education availability for adults and youth. The computer-assisted remediation program called Basic Education Initiative, BEI, served nearly 15,013 people at 51 locations by the end of PY'88 and continued to grow.

Partnerships between state and local agencies focused on opening new joint programs and new lines of communication. The most significant and lasting partnership has been the voluntary cooperation of local agencies providing services because of mutual interests. JTPA provides the legal authority to bring together the public and private agencies and employers to influence ser-

vice delivery in their regions. Thus, previous partnership efforts were supported by an entity which had the resources and talents to bring together the necessary actors at the local level to ensure efficient and cost-effective delivery of services.

The Governor's Coordination Criteria for PY'88 and PY'89 required written, local coordination

plans covering three (3) areas: Outreach, Intake, Assessment and Referral (OIAR); Employer Marketing and an Educational Linkage policy. Each was to be planned and implemented during the two program years. The Coordination Criteria for PY'90 and '91 was developed to facilitate the growth of this local inter-agency approach.

RESOURCE USE

Title II SDA Level Resource Use

Resources available for PY'90 are at a slightly higher level than the previous year. SDAs in Missouri will use JTPA Title II-A and II-B resources to provide a variety of job training activities in accordance with approved Job Training Plans. Funds will primarily be used for programs that involve occupational skills classroom training and on-the-job training. The program offered to economically disadvantaged youth during the summer, using Title II-B funds, consists predominately of opportunities to gain work experience. However, there will be a strong emphasis on youth participation in remedial and basic education.

Title II-A 5% Administrative Activities

This funding source will be used by the State for administrative activities and selected allowable activities under sections 121 and 122 of JTPA. Administrative activities include planning and evaluation, program management, operations and monitoring, and fiscal management.

JDT assists SDAs with the development of local plans and evaluates program effectiveness for

both state and local programs. JDT also coordinates and upgrades statewide participant and financial management of program performance levels. A statewide post program follow-up survey based on a random sample of all Title II-A adults and adult welfare terminées is conducted every 13 weeks. Local SDA job training plans are evaluated by the state for compliance with state and federal law and certified for consistency with the Governor's Coordination and Special Services Plan. The State fulfills all federal reporting requirements on JTPA program performance and develops policy issuances and regulations for the implementation and operation of JTPA.

JDT monitors contractors and job sites for compliance with federal laws and regulations. The State also monitors planned versus actual performance to ensure that SDA contractors' performance demonstrates consistent progress.

JDT ensures that the obligation and expenditure of JTPA funds and the use of property are in compliance with the requirements and conditions of JTPA grants. The State provides financial information to meet federal, state, and internal financial reporting requirements. Accounting records and documentation to identify and support expenditure of JTPA funds are also maintained. In addition, JDT will review independent audit reports of each recipient of JTPA funds for compliance with federal and state regulations. Procedures for deobligation of unspent funds and repayment of

misspent funds are included in the fiscal management system.

JDT's current Deobligation/Reobligation Guidelines were implemented on June 14, 1989. A copy of the Guidelines are included as Attachment A. The Guidelines cover Title II-A 78% and 6% incentive funds. All other Title II-A funds are contracted and monitored on an annual basis by the state agency and funds are expended on a "first in first out" (FIFO) basis.

JDT will conduct selected activities under Section 121(c) of the Act as described in this plan. JDT provides staff support to the MJTCC to assist the Council in carrying out its duties as described in the Act.

Title II-A 3% Experienced Worker Program

Missouri ranks thirteen in the nation in the proportion of the population aged 55 and older, and economically disadvantaged. Approximately 240,000 Missourians aged 55 and over were economically disadvantaged, potentially meeting the JTPA eligibility guidelines.

JDT administers the Title II-A 3% Experienced Worker Program (EWP) through contracts with local program operators who have demonstrated the capacity to manage quality employment and training programs. JDT provides overall program planning, administration, technical assistance, monitoring and evaluation.

In PY'90 Missouri will distribute \$1,042,556 (excluding carry-in funds) under the Title II-A 3% set-aside to operate job training programs for older workers throughout Missouri. These funds will be used to train and employ economically disadvantaged older individuals, 55 years of age and over, who have encountered barriers to employment.

JDT will contract local EWP administration and delivery through the Administrative Entity (AE) of the Service Delivery Areas (SDA). This approach should increase coordination with locally administered JTPA services, linking EWP to the SDA program delivery system.

In any SDA where the AE does not wish to participate in direct EWP administration, JDT will seek an EWP contractor with the demonstrated ability to provide program services to 3% eligible participants.

Funds will be distributed to the 3% contractor in each SDA based on an allocation method which considers the relative number of economically disadvantaged persons aged 55 and over within the SDAs. Each 3% contractor's responsibility will consist of, but not be limited to, the day to day operation and fiscal functions of the program as specified in JDT's contract agreement with them.

On-the-job training and job search assistance comprise the two primary program activities for the EWP. On-the-job training may consist of either part-time or full-time training depending upon the needs of the older worker and the employer. Job search assistance is a group approach to teaching effective job finding skills to the unemployed.

In addition, all program operators will offer participants a comprehensive mix of services, tailored to individual needs. Additional assistance available to program participants include: assessment of skills; needs; and employment goals; vocational training; counseling and supportive services and; needs based payments if appropriate. Following the assessment, job development efforts will be directed at both full-time and part-time on-the-job training in the private sector. Since part-time employment plays an important role in matching employers' needs with the needs of older workers, job development efforts will be specifically targeted to those employers using part-time positions. In addition, those industries and occupations projected to have the largest employment increases in the future are frequent users of part-time workers.

Vocational training will also be made available to older workers through a contract with the DESE. JDT has set aside Title II-A (3%) funds specifically for this purpose.

To assist EWP program operators in providing a mix of program services, the Missouri JDT will place greater emphasis on the provision of technical assistance, training and program reviews. All EWP contractors will be required to meet perfor-

mance standards criteria. EWP operators' performance will be regularly evaluated by JDT using a quarterly Performance Report sent to each program operator.

JDT will continue to encourage both state and local coordination activities. The Division has developed linkages with the Missouri Division of Aging, Missouri DES, Older Americans Act Title V operators, and other employment and training agencies which offer services to older individuals. The Division expects to expand employment opportunities for its older participants by networking with those agencies that provide employment services and share similar concerns for older individuals. In addition, a JDT staff member serves on the Division of Aging, Governor's Advisory Council - Employment Committee, to increase program coordination and exchange program information.

JDT plans to serve 928 older workers with an anticipated entered employment rate of 75 percent. The average cost per entered employment will be \$1,500 and the average wage at placement will be \$4.50 per hour.

Title II-A 8%

Annually, JDT will reach a cooperative agreement as provided in JTPA Section 123(a) with the Department of Elementary and Secondary Education. The cooperative agreement shall be the Title II-A 8% contract(s) issued or any amendments thereto, for that particular fiscal year.

The cooperative agreement shall require DESE to provide match equal to all the Title II-A 8% funds provided under the JTPA Section 123(a)(1) and (3). Title II-A 8% funds provided under JTPA Section 123(a)(2) to facilitate coordination shall not require matching funds.

Any Title II-A 8% funds not included in the cooperative agreement shall be available for use in accordance with Section 121 per JTPA Section 123(d). Any funds not included in the cooperative agreement shall not require matching funds.

Title II-A 8% State Education Funds

Learnfare/Welfare To Work

Many individuals on welfare are only able to obtain entry level positions in low paying fields, thus providing little incentive to leave the welfare system. To break this cycle, Learnfare/Welfare to Work projects have been established in St. Louis and Kansas City.

Through these projects, individuals will receive basic skills training, remedial education, and employability enhancement skills. The goal of this training is to enable individuals to obtain jobs above the minimum wage and gain financial self-sufficiency.

Centers for At-Risk Youth

There are 23 Centers for At-Risk Youth (CARY) projects currently in operation with plans to increase that number later in PY'90. CARY projects provide services to school dropouts and potential dropouts with remedial and basic education deficiencies and who are also economically or academically disadvantaged. For JTPA purposes, an academically disadvantaged individual is defined as one who possesses three or more of the following attributes: (This definition does not include learning disabilities.)

1. Has scores below the 25th percentile on a standardized achievement or aptitude test.
2. Has school grades that are below a 2.00 on a 4.00 scale.
3. Has failed one or more grade levels.
4. Has an absentee rate of ten (10) or more days per year or five (5) or more days in the preceding semester.
5. Has a reading and/or math grade equivalency at least 1.0 below current grade placement.
6. Has either parent or appropriate aged sibling that has not received a high school diploma or General Educational Development (GED) certificate.

A counselor is responsible for organizing the assessment and evaluation activities for the project. Identification for entry into CARY begins while the student is in the eighth grade. A six (6) week summer remedial education program may be available for those eighth graders who are identified as in need of services.

Dropouts may enter the project at any point and may select a GED certificate route tied to vocational education or high school credit with vocational education.

Based on the general description of the project, the students served under the program may include:

1. Individuals age 14 or over who are identified as potential dropouts.
2. Individuals age 16-21 who have dropped out of school.
3. Individuals who are unlikely to complete a course of study which results in a sufficient number of credits to meet school graduation requirements.
4. Students currently enrolled in a vocational education program who have been identified as lacking certain basic skills.
5. Students who require more time to achieve than the traditional classroom allows.
6. Adults, 22 years of age or older, who have not graduated from high school.

With the beginning of the ninth grade, students may be placed in basic skills classes. Contents of the basic skills classes may include: language arts/communication skills, social studies, science, mathematics, and fine arts. Types of services to be provided may include: assessment and evaluation, academic instruction and remediation, employability skills, job placement services, guidance and counseling, and occupational skills training. If it becomes apparent that the high school student cannot earn enough high school credits to graduate with his regular graduating class, the project emphasis shifts toward attainment of a GED certificate. Upon reaching the eleventh grade, the student is referred to the appropriate occupational education program.

The operation of the project at each site is funded from a variety of sources depending upon availability and need. Typically, funding comes from State JTPA 8% funds, JTPA II-A and II-B summer youth program, Carl D. Perkins funds, Adult Basic Education (ABE), Average Daily Attendance (ADA), local funds, and In-Kind contributions.

Assessment Centers

Assessment Centers serve a two-fold purpose. First, they provide quality information reaching the heart of career guidance, career and vocational placement, and evaluation of human potential. Second, they are a practical solution for other human service agencies who need this type of program to service their client but lack the resources to do so.

Assessment Center projects have been implemented in the cities of Sedalia, St. Charles, Hillsboro, Springfield, Cape Girardeau, Sikeston, St. Louis, and Kansas City. There are several more centers planned which are intended, when established, to provide statewide coverage. Assessment centers will play a vital role in the success of the JOBS program.

The assessment process will identify individual interests, aptitude, and abilities. The process will provide a basis for realistic planning and goal setting relative to employment or training.

Basic Education Initiative

Basic Education Initiative (BEI) is a computerized basic skills program designed to provide individuals, reading as low as the third grade level, with the necessary remediation to upgrade their education level and obtain a high school equivalency certification. PY'88 ended with nearly 15,013 people served by the program in 51 locations. The program is continuing with the upgrade of equipment and the possibility of expansion into more locations.

Customized Training

Through a contractual agreement, JDT and DESE administer the Missouri Customized Training Program, an employer responsive program, that serves as the flagship for the State's

efforts to create and retain employment through training assistance. Missouri Customized Training allows employers to tailor a program to fit their needs through on-the-job training and formal group or classroom training.

Under guidance from the Customized Training and Economic Development Committee, JDT dedicates funds to the Missouri Customized Training Program to enhance the employment opportunities for eligible participants in newly created jobs with new and expanding employers. State General Revenue funds are also available through DESE and the Missouri Job Development Fund, which allows customized training to be provided for retraining existing workers to retain their jobs, and training for newly created jobs.

Guidance for the administration of the Missouri Job Development Fund is provided by the Missouri Job Training Joint Legislative Oversight Committee, a bi-partisan representation from both houses of the State Legislature. These funds are also jointly administered by JDT and DESE. Missouri employers may request training assistance by applying to either state agency.

The variety of available funding sources, each with unique benefits, provides Missouri employers with an avenue to lower the cost of training, and assures that the Missouri Customized Training Program will remain a valuable economic development tool for the State.

Once an application has been reviewed, a training project is implemented by the employer and the administrative agencies. Since the training projects are designed to meet the needs of a specific employer, or a group of employers with a similar training requirement, projects tend to be unique. Training projects are reviewed based on the following criteria: 1) the number of new jobs created within the State; 2) cost effectiveness; 3) retention of trainees at the completion of training; and, 4) wage benefit to trainees.

The development of customized training projects are closely aligned, whenever possible, to additional funding sources through Title III, Title II-A (3%), and Title II-A funds from PICS. This

further combination of funds maximizes the training opportunities for Title II-A and Title III eligible participants and provides Missouri employers with a greater opportunity to fulfill their training needs in a more cost effective manner.

Since JTPA 8% funds must be matched dollar for dollar, the participating employer is strongly encouraged to contribute to the cost of the training project. Private sector contributions such as wages paid to trainees, training equipment, facilities and supplies constitute valuable sources for required match. Additional matching can be provided through State training funds. An employer's training requirements may be best served through Classroom Skill Training, On-the-Job Training, or a combination of these two training components. Classroom Training activities can be delivered through a private training institution, an area vocational/technical school, junior college, or college. An employer's own employees can also be temporarily certified as vocational instructors through DESE.

To ensure that local delivery of services are in compliance with all applicable Federal and State laws and regulations, monitoring is regularly conducted by JDT.

For the Customized Training Program, JDT intends a minimum entered employment rate of 80%, with an average wage at placement of \$5.50. The cost per entered employment will be approximately \$1,800.

Task Oriented Training is a new training service available through the Customized Training Program. It is based on the identification of the tasks or skills needed by an employee to be successful in a given job. These identified tasks then become the framework for the development of an on-the-job training program.

A new service delivery system has been implemented. This system provided for the joint operation of customized training projects by the Administrative Entity and the Division of Employment Security. This system will foster the development of community linkages to ensure efficient and cooperative delivery of services.

OVERSIGHT AND SUPPORT ACTIVITIES

The State of Missouri will conduct on-site monitoring visits of all SDA Title II-A and Title II-B programs to assess compliance with JTPA, state established fiscal policies and procedures, related applicable laws and regulations, and the local Job Training Plans. Similarly, operators of Title II-A 8% and 3% programs will also be monitored annually to ensure legal and programmatic compliance. JDT will also test selected problem areas for further, more in-depth review. These reviews may consist of surveys, in-depth reviews of reporting, or more detailed on-site program reviews.

Written reports will be issued after each monitoring with appropriate corrective action required within thirty days. On-site follow-up regarding the implementation of SDA corrective action will occur at a reasonable time interval following the receipt of a corrective action plan.

The State will also provide support to SDAs through various ongoing training and technical assistance activities. A training institute will be funded from 6% dollars to offer technical assistance on a wide range of problems. Bi-monthly meetings will be conducted with the 15 administrative entity directors to address state and federal policy issues relative to JTPA implementation. SDAs and individual program operators will also receive direct JDT on-site training and technical assistance, as needed, based on findings from both on-site monitoring and desk reviews. These activities may be provided on an individual basis or through group sessions on a regional or statewide scale.

PERFORMANCE STANDARDS

Methodology Adjustment

Missouri plans to use the Department of Labor's (DOL's) national adjustment models to adjust SDA performance standards. Planned performance standards are calculated from data submitted in the SDA Job Training Plan as well as the state data provided by DOL and local economic data. Missouri plans to use the following standards for PY'90:

- Youth Entered Employment Rate
- Youth Employability Enhancement Rate
- Adult Follow-Up Employment Rate
- Adult Follow-Up Weekly Earnings
- Adult Welfare Follow-Up Weekly Earnings
- Adult Welfare Follow-Up Entered Employment Rate

Regional adjustments may be made on Title II-A standards at the Governor's option. At the end of the year, final performance standards are calculated for each SDA. End-of-year terminee characteristics and updated economic data are used in the DOL model. The average unemployment for the period of April, 1990 through March, 1991 will be used. Actual performance levels are compared to these final performance standards to determine which SDAs will be eligible for incen-

tive grants or in need of technical assistance. An SDA may appeal any model adjusted standard that is an extreme value at this time. Appeals will also be considered on standards that have been derived using two or more extreme factor values.

Failure to attain a positive or zero numerical value using the overall average of the percents by which an SDA exceeds or fails to meet each performance standard at the end of any two consecutive program years will result in the imposition of performance standards sanctions and necessitate the development of a reorganization plan as required by section 106 of the Act.

Such a plan may restructure the PIC, prohibit the use of designated service providers or make such other changes as the governor deems necessary to improve performance. The governor may also select an alternate entity to administer the program for the SDA. The alternate AE may be a newly formed PIC or any agency jointly selected by the governor and the Chief Elected Official (CEO) of the largest unit of general local government in the SDA.

Any reorganization plans made in accordance with this performance standards sanction policy shall be made with full opportunity for a hearing before a hearing officer. The hearing must be requested within 10 days of the receipt of the governor's reorganization plan. A hearing will be held within 30 days of filing and written notification of the hearing determination issued within 60 days.

Upon receipt of the governor's written notification that the hearing determination upholds the governor's imposition of a reorganization plan, an SDA may appeal to the Secretary of Labor. Appeals must be submitted jointly by the PIC and CEO(s) of the SDA. The secretary will accept appeals dated no later than 30 days after the SDA's receipt of the governor's written notification of the hearing determination. A copy of the appeal must be simultaneously mailed to JDT when filed. The secretary shall make a decision within 60 days of the date of appeal.

Sanctions will be imposed through a sanction letter signed by the director of JDT. Sanction letters will be mailed to the chairperson of the PIC, the CEO(s) and the director of the AE. Corrective action plans which are developed in response to a sanction must contain the signature of all three of these individuals.

Sanctions will be removed only through a letter signed by the Director of JDT.

STATE INCENTIVE GRANTS

Title II-A 6% Incentive and Technical Assistance

Priorities and Criteria for State Incentive Grants

Missouri's incentive grant system will:

- Provide incentive grants to the SDAs that exceed their minimum performance goals;
- Relate incentive grants to the degree by which SDAs exceed their performance standards;
- Consider the relative size of the SDAs; and
- Consider SDA success in serving school dropouts and welfare recipients.

The method to distribute incentive grants for PY'90 consists of the following steps:

Step 1: Determine the percent by which the SDAs exceed (or fail to meet) their performance standard for each of the approved six (6) minimum performance categories.

Step 2: Calculate the overall average of the percents exceeding (or failing to exceed) for all six (6) performance standards from step 1 for each SDA and divide by six (6), resulting in an overall

average percent exceeded minimum performance standards.

Step 3: Sum the average percent exceeded performance standards for all SDAs.

Step 4: Divide each SDA's average percent exceeded performance standards by the sum in step 3 to obtain each SDA's relative share of that sum.

Step 5: Multiply each SDA's relative share obtained from step 4 by a specified pool of funds.

Step 6: Sum the percentage portion of Title II-A (78%) funds for all SDAs.

Step 7: Divide each SDA's percentage portion of Title II-A funds by the sum in step 6 to obtain each SDA's relative share of that sum.

Step 8: Multiply each SDA's relative share obtained from step 7 by a specified pool of funds.

Step 9: Sum the percents of attainment of required service to school dropouts for all SDAs.

Step 10: Divide each SDA's percent attainment of required service to school dropouts by the sum from step 9 to obtain each SDA's relative share of that sum.

Step 11: Multiply each SDA's relative share obtained from step 10 by a specified pool of funds.

Step 12: Sum the percents of attainment of required services to welfare recipients for all SDAs.

Step 13: Divide each SDA's percent attainment of required service to welfare recipients by the sum from step 12 to obtain each SDA's relative share of that sum.

Step 14: Multiply each SDA's relative share obtained from step 13 by a specified pool of funds.

Step 15: Add the figures obtained for each SDA from step 5, step 8, step 11, and step 14.

Step 16: Award the amount of funds determined in step 15 to each SDA. At the end of PY'90 two-thirds of the incentive grant pool will be awarded

to the SDAs based upon the percent they have exceeded their relative minimum performance standards. One-ninth will be awarded based upon each SDAs relative share of Title II-A 78% funds. One-ninth will be awarded based upon each SDAs percent of achievements of their minimum service requirement to welfare recipients. One-ninth will be awarded based upon each SDAs percent of achievement of their minimum service requirement to school dropouts. Funds awarded through this process will not be subject to the performance standard process.

GOVERNOR'S COORDINATION AND SPECIAL SERVICES ACTIVITIES

Information and technical assistance for developing and implementing plans and programs

The State has established an issuance system to communicate JTPA policy decisions and pertinent information to SDAs. For instance, a recent issuance provided an update of the regional treatment centers where drug information and services can be obtained.

The State has issued planning guidelines to SDAs to assist in the development of their local Job Training Plans. In addition, data has been sent to assist SDAs in meeting the statutory requirements of service levels to economically disadvantaged school dropouts, economically disadvantaged youth and AFDC recipients as well as the ratio of public to private employment for use in planning the OJT program.

The State will provide technical assistance directly or provide preventative technical assistance through the Missouri Institute for Executive Development at the University of Missouri-Columbia. The training is a jointly designed and

supported effort by the state and SDAs which provides more timely technical assistance to the SDAs of Missouri. The State, through JDT, has established a field representative system to provide technical assistance in planning and implementing JTPA programs. Three full-time staff members serve as liaisons between their assigned SDAs and JDT.

Developing and providing to SDAs labor market information on a state and local basis

The State has provided SDAs information, at statewide and SDA specific levels, regarding social and economic characteristics, occupational and industrial characteristics, and labor market conditions. The State has and will continue to develop information on industries losing or gaining employment and industries expanding their work forces. Occupational projections to 2000 have been developed for the State, St. Louis Standard Metropolitan Statistical Area (SMSA), and Kansas City SMSA. Projections for the remaining SDAs will be published in PY'91. These projec-

tions identify occupations in demand as well as other occupational information. JDT, working with the State Data Center, the Missouri Occupational Information Coordinating Committee, and DES, provides SDAs with a variety of publications, newsletters, and data reports on a variety of labor market issues. Special requests for sub-SDA data analysis are also completed on an as needed basis.

Providing pre-service and in-service training for Administrative Entities, Private Industry Councils, and contractors for state supported programs

Following PIC certification by the Governor, the State provided orientation sessions for each of Missouri's PICs. The State will continue to provide in-service training to PICs through its field representatives, operations staff, and the Missouri Training Institute.

In addition, the State has and will continue to convene regular meetings of the SDAs' AE staffs to provide in-service training and discuss issues of concern among SDAs. The State has and will continue to provide training to SDA staffs to promote effective management of local training programs.

The State annually convenes a Job Training Conference for PIC members, SDA staff, and local elected officials. Additional coordination and special services activities may be undertaken should any 8% funds not be obligated through cooperative agreements.

Food Stamp/AFDC

The State seeks to establish a linkage that will increase the opportunity to provide JTPA services to those Missourians considered "most in need". While the State targets service to recipients of AFDC, the need exists to explore additional

avenues to access these and other hard to serve individuals.

As stated in N. 20 CFR 627.24(6), JTPA Title II-A 6% Technical Assistance funds are to be used for "activities directly related to program performance." The State feels that increased participation in JTPA by Food Stamp recipients will correspondingly increase JTPA participation by high school dropouts and AFDC recipients, both mandated performance standard categories.

During PY'89, 86% of Food Stamp recipients served with JTPA Title II-A funds in Missouri were also receiving AFDC. Furthermore, during that same time period, 40% of all Food Stamp recipients served were also high school dropouts.

During the first quarter of PY'90, the State will seek to improve program performance through increased service to AFDC recipients and the hard to serve. The opportunity to couple JTPA Title II-A 6% Technical Assistance funds with United States Department of Agriculture (USDA) monies, made available through the State's Division of Family Services (DFS), will enhance accessibility to JTPA services for Food Stamp recipients and other hard to serve individuals.

Unless exempted for good cause, Food Stamp recipients must participate in the DFS Missouri Employment and Training Program (METP). Of the available options for METP participants, participation in JTPA activities has been made one of the options available to fulfill METP obligations.

The State will provide JTPA services to Food Stamp recipients through a program structured to serve 50% of all participants through job search assistance classroom activities. The Food Stamp Job Search Assistance Program will offer other JTPA training activities to participants on an "as needed" basis as determined by SDAs during assessment.

It is the State's intent to also allow this programmatic linkage between JTPA and DFS to act as a precursor to Missouri's upcoming implementation of the Job Opportunities and Basic Skill Training (JOBS) program under the Family Support Act.

Missouri Veterans Program

The focus for PY'90 of the Missouri Veterans Program will be to provide intensive personal contact and supportive services to not job-ready veterans. The federal Title IV-C funds are matched with the state's 8% as well as available local match funds.

Eligible veterans could include those who are: 1) service-connected disabled; 2) Vietnam era; and 3) recently separated from the military.

JDT will conduct oversight reporting and administration for the veterans' employment program to operate in the metropolitan areas of St. Louis and Kansas City. An intensive case management approach will focus on a comprehensive provision of services consisting of career interest assessment, clinical counseling (including psychological, when necessary), and supportive services which enable the hard to serve veteran to transition to on-the-job training and classroom-occupational training.

Job Opportunities and Basic Skills (JOBS) Program

The Missouri JOBS program for welfare reform will implement its first phase in July, 1990 in 13 counties of the state. This includes the St. Louis area and southeastern Missouri. JOBS must be available across Missouri - except in geographically remote areas where AFDC caseloads and education and training options are low - by October 1, 1992.

JOBS will target three (3) groups at greatest risk of continuing dependency:

- Long-time AFDC recipients;

- Young parents without a high school education; and
- Parents who will lose AFDC eligibility, due to the age of their children, within two (2) years.

The Missouri program will build on the success of other programs aimed at decreasing welfare dependence. It will be comprehensive, using a wide array of options to help AFDC parents overcome employment barriers. The program will be focusing on a total service package for each participant. JOBS will use case managers to orient and guide AFDC parents to education, training and support services. With professional and personal knowledge of local resources, the case manager will be an important bridge between the AFDC parent and employment goals.

The state's departments of Social Services, Labor, Education and Economic Development are charged with avoiding duplication, with making the best use of existing systems and with using general revenue to maximize the level of federal dollars flowing to Missouri for the JOBS program.

The Governor proposes to designate existing funds and secure new resources to begin statewide implementation of the JOBS program. Planning, staffing, discussions with welfare rights advocates and community groups, public hearings and inter-agency work have begun and are continuing as phase one of implementation approaches. Local and state-level welfare reform advisory groups will assure that community voices are heard.

JDT has actively participated in the four (4) JOBS planning committees established in November, 1989. The employment and training system will be actively involved in the provision of the occupational skill training and on-the-job training. It will also provide assessment services which will complement the initial assessment and appropriate other services to aid in reaching the AFDC participant's personal goals for achievement.

ASSURANCES

JTPA COMPLIANCE WITH SECTION 167

The State has adequate methods of administration to assure compliance with Section 167 of the

Act through on-going monitoring, site visits, and technical assistance.


APPENDICES

STATE OF MISSOURI

GOVERNOR'S COORDINATION AND SPECIAL SERVICES PLAN

PROGRAM YEARS 1990 AND 1991

Signature Page

	April 30, 1990
John D. Ashcroft, Governor	Date

Deobligation/Reobligation of Funds Guidelines

Policy for Title II-A 78% and 6% Incentive - Beginning July 1, 1988, to avoid any funds being deobligated from their SDA, SDAs shall expend at least 80% of the Title II-A 78% and 6% Incentive funds available to them on July 1st of the program year by June 30th of the following year. On July 1st of each year the total funds available (including all prior program year funds) for Title II-A 78% and 6% Incentive funds will be computed for each SDA. These amounts will be the BUDGET for purposes of this issuance. Funds made available after July 1st will not be included in the BUDGET for that fiscal year and, therefore, not subject to this process in the year received. Reobligation Funds are considered available July 1st even though reobligation takes place during the year.

The SDA is required to spend JTPA funds on a "first in" "first out" (FIFO) basis as follows: the funds available on July 1st shall be spent prior to the funds received after July 1st. Within these two categories of funds the oldest program year funds shall be expended first.

Compliance with the 80% expenditure requirement shall be based upon June 30 Contract Progress Reports (CPRs) including accruals. (JDT reserves the right to investigate and revise any CPR accrual which appears excessive.) The total expenditures on the CPRs will be divided by the BUDGET figure. If the PERCENT EXPENDED is at least 80%, no dollars are subject to deobligation. If the PERCENT EXPENDED is less than 80%, The amount of funds to be deobligated is the difference between the required 80% expenditure rate and the actual expenditure rate achieved. All deobligated fund amounts from every SDA shall be added together to determine total funds for reobligation.

Deobligation of funds shall be accomplished by reducing current year new funding for the total amount of funds to be deobligated. SDAs with deobligated funds shall not be eligible for reobligated funds.

Reobligation of funds shall be accomplished by increasing current year new funds as follows. The most current SDA allocation percentages for eligible SDAs shall be added together creating the total percentage. Each current SDA allocation percentage for eligible SDAs will then be divided by the total percentage resulting in the reobligation percentage. Individual reobligation percentages will be rounded to ensure the total percentages do not exceed 100%. The total to be reobligated will then be multiplied by the reobligation percentages resulting in the reobligation amount for each SDA. SDAs will be notified of this amount and requested to amend their plan according to existing procedures.

CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

This certification is being made in compliance with the Drug-Free Workplace Act of 1988.

The State of Missouri certifies that it will provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing a drug-free awareness program to inform employees about --
 - (1) the dangers of drug abuse in the workplace;
 - (2) the grantee's policy of maintaining a drug-free workplace;
 - (3) any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) the penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will --
 - (1) abide by the terms of the statement; and
 - (2) notify the employer of any criminal drug statute conviction for a violation occurring in the workplace not later than five days after such conviction;
- (e) Notifying the grantor within ten days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction;
- (f) Taking one of the following actions, within 30 days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted --
 - (1) taking appropriate personnel action against such an employee, up to and including termination; or

- (2) requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).

Place of Performance: This statewide certification will apply to any of the state's executive branch departments and all of the divisions and locations within these departments throughout the State of Missouri. The addresses of the offices of each department director are attached. Specific site location will be provided, as needed, with grant applications.

This certificate is for the period from March 31, 1990 through March 30, 1991.

This assurance is given in connection with any and all financial assistance from the Department of Labor after the date this form is signed. This includes payments after such date for financial assistance approved before such date. The applicant recognizes and agrees that any such assistance will be extended in reliance on the representations and agreements made in this assurance, and the United States shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the applicant, its successors, transferees, and assignees, and on the authorized official, and is made in accordance with and to the extent of the authority of the undersigned.

State of Missouri:

March 26, 1990

Date


GOVERNOR

CERTIFICATION REGARDING LOBBYING

CERTIFICATION FOR CONTRACTS, GRANTS, LOANS, AND COOPERATIVE AGREEMENTS

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all* subawards at all tiers (including subcontracts, subgrants and contracts under grants, loans, and cooperative agreements) and that all* subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

<u>State of Missouri/Division of Job Development & Training</u>	<u>JTPA</u>
Grantee/Contractor Organization	Program/Title
<u>Larry Earley</u>	<u>March 27, 1990</u>
Name of Certifying Official	Signature Date

*Note: In these instances, "All," in the Final Rule is expected to be clarified to show that it applies to covered contract/grant transactions over \$100,000 (per OMB).

CERTIFICATION REGARDING LOBBYING

CERTIFICATION FOR CONTRACTS, GRANTS, LOANS, AND COOPERATIVE AGREEMENTS

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress; or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all* subawards at all tiers (including subcontracts, subgrants and contracts under grants, loans, and cooperative agreements) and that all* subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

State of Missouri/Division of Job Development & Training	JTPA / Title III
Grantee/Contractor Organization	Program/Title
Larry Earley	June 19, 1990
Name of Certifying Official	Signature Date

*Note: In these instances, "All," in the Final Rule is expected to be clarified to show that it applies to covered contract/grant transactions over \$100,000 (per OMB).

CERTIFICATION REGARDING LOBBYING

CERTIFICATION FOR CONTRACTS, GRANTS, LOANS, AND COOPERATIVE AGREEMENTS

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all* subawards at all tiers (including subcontracts, subgrants and contracts under grants, loans, and cooperative agreements) and that all* subrecipients shall certify and disclose accordingly.

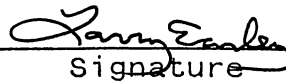
This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

State of Missouri/Division of Job Development & Training
Grantee/Contractor Organization

JTPA/Title II-A
Program/Title

Larry Earley

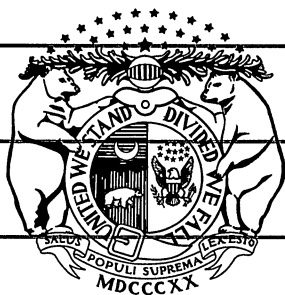
Name of Certifying Official


Signature

June 19, 1990

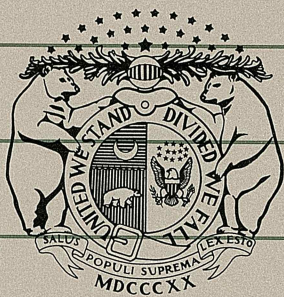
Date

*Note: In these instances, "All," in the Final Rule is expected to be clarified to show that it applies to covered contract/grant transactions over \$100,000 (per OMB).



produced by:

**The Missouri Department of Economic Development
Division of Job Development and Training**



produced by:

The Missouri Department of Economic Development
Division of Job Development and Training